1	RENE L. VALLADARES		
2	Federal Public Defender State Bar No. 11479 RAQUEL LAZO Assistant Federal Public Defender		
3			
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5	Fax: (702) 388-6261		
6	Attorney for STUART		
7			
8	UNITED STATES DISTRICT COURT		
9	DISTRICT OF NEVADA		
10	UNITED STATES OF AMERICA,	2:12-cr-264-APG-GWF	
11	Plaintiff,	UNOPPOSED MOTION AND	
12	VS.	PROPOSED ORDER TO MODIFY THE CONDITIONS OF PRETRIAL RELEASE	
13	RASCHID STUART,		
14	Defendant.		
15			
16	COMES NOW THE DEFENDANT, Raschid Stuart, by and through counsel, Rene L		
17	Valladares, Federal Public Defender, and RAQUEL LAZO, Assistant Federal Public Defender		
18	counsel for RASCHID STUART, that the conditions of Mr. Stuart's release be modified to include		
19	permission to travel out of the jurisdiction temporarily to San Antonio, Texas.		
20	1. Mr. Stuart requests permission to travel to San Antonio, Texas from August 9, 2013		
21	to August 13, 2013. Mr. Stuart's sole reason for the requested travel is to see his daughter. He was		
22	unable to visit her during his last visit to San Antonio, Texas, on June 27, 2013 to June 30, 2013,		
23	because she was in summer camp in Georgia. The client will be staying with his mother.		
24	2. Mr. Stuart's pretrial officer, Jaime	Stroup, reports that Mr. Stuart has been fully	
25	complaint and therefore he does not oppose this request.		
26	3. Government counsel also has no opp	position.	
27	1//		
28	///		

1	DATED this 1st day of August, 2013.	
2		Respectfully submitted,
3		RENE L. VALLADARES
4		Federal Public Defender
5	Ву:	/s/ Raquel Lazo
6		RAQUEL LAZO, Assistant Federal Public Defender Counsel for Raschid Stuart
7		Counsel for Raschid Stuart
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CERTIFICATE OF ELECTRONIC SERVICE The undersigned hereby certifies that she is an employee of the Law Offices of the Federal Public Defender for the District of Nevada and is a person of such age and discretion as to be competent to serve papers. That on August 1, 2013, she served an electronic copy of the above and foregoing UNOPPOSED MOTION AND PROPOSED ORDER TO MODIFY THE CONDITIONS OF **PRETRIAL RELEASE** by electronic service (ECF) to the person named below: DANIEL BOGDEN United States Attorney 333 Las Vegas Blvd. So., 5th Floor Las Vegas, Nevada 89101 WILLIAM R. REED Assistant United States Attorney 333 Las Vegas Blvd. So. 5th Floor Las Vegas, NV 89101 /s/ Maribel Bran Employee of the Federal Public Defender